



January 5, 2012

Mr. Garth Koller - Principal Planner  
CITY OF SAN MARCOS  
1 Civic Center Drive  
San Marcos, California 92069

**RE: Comments on Draft EIR and General Plan Update Document**

Dear Garth:

I just have a couple of brief comments.

- E13-1      1.) EIR – Appendix D-1 – Table D-1 (San Marcos Focus Areas): for Focus Area 28 in the GPLU column it should read “SPA (LI/C/MHDR/OS)”. This will make it consistent with Focus Area 11 in the same Table as well as with the wording for CA 7 and POA 19 in the General Plan Document. It was LI that was approved, not BP.
- E13-2      2.) EIR – General Plan Land Use Map – Figure 2.0-3: there is no Land Use Type color designator for Focus Areas 11/28 and 29. Please color them to be consistent with the land uses called out in the GPLU column of Table D-1 of Appendix D-1.
- E13-3      3.) General Plan Update Document: for POA 20-23 the words “up to” should be deleted. This property has always been designated for 89 units. No variation from this amount was ever discussed at any of the meetings or workshops.

Thank you for your time and attention to my comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen A. Bieri".

Stephen A. Bieri

P.O. Box 270150 • San Diego, CA 92198-2150 • 656.376.2900 • FAX 656.375.2904

### **E13 Stephen Bieri**

- E13-1 This comment requires further response from the City. This response will be provided by 1/17/2011 and will be included in the final version of this Response to Comments Appendix.
- E13-2 Focus Areas 11, 28, and 29 are designated as Specific Plan Areas (SPA) and are therefore shown on Figure 2.0-3 in the color designated for SPAs. No changes to Figure 2.0-3 have been made.
- E13-3 Discussions regarding PO 20-23 in the Draft General Plan have been revised to modify the language from “up to 89 units” to “maximum of 89 units”. Due to physical constraints on the site, it is unknown whether the area can yield all 89 units. This language allows flexibility in the event that 89 units cannot be achieved.

DRAFT

**Kiss, Lisa**

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**From:** Barry, Robert [Robert.Barry@sdcounty.ca.gov]  
**Sent:** Thursday, January 05, 2012 5:06 PM  
**To:** Kiss, Lisa  
**Subject:** LAFCO comments on the Draft PEIR for the City of San Marcos General Plan Update

City of San Marcos  
Attn: Garth Koller c/o Lisa Kiss, Planning Division  
1 Civic Center Drive  
San Marcos, CA 92069

Mr. Koller,

Thank you for providing the San Diego LAFCO with the opportunity to provide comments on the Draft PEIR for the City of San Marcos General Plan Update.

The City of San Marcos General Plan Update does not appear to include changes (expansions/contractions) to the San Marcos Planning Area. If changes to the San Marcos Planning Area are proposed in the General Plan Update, these changes may require subsequent action(s) by LAFCO involving revisions or a comprehensive update to the City's adopted sphere of influence; therefore, any such changes should be identified and discussed in the Draft PEIR.

The Draft PEIR does not identify any proposed changes to the existing San Marcos Planning Area that may potentially affect the adopted sphere of influence for the City of San Marcos; therefore, San Diego LAFCO has no additional comments on the draft document.

Please let me know if you have any questions.

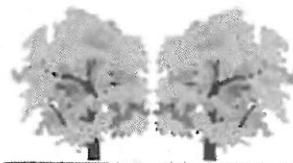
E14-1

Robert Barry, AICP  
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(858) 614-7788  
<http://www.sdlafco.org>

**E14 San Diego LAFCO, Robert Barry**

E14-1 Comment noted. No further response required.

DRAFT



## Twin Oaks Valley Community Sponsor Group

P.O. Box 455

San Marcos, Ca. 92079

January 5, 2012

City of San Marcos

RECEIVED

JAN 09 2012

SAN MARCOS  
PLANNING DIVISION

Dear Mr Kohler,

E15-1

Thank you very much for this opportunity to comment on the proposed San Marcos General Plan and DEIR. These are very detailed and complex documents and due to time constraints we have had to keep our comments limited. It is really too bad that those who could not access the document on the website and therefore are dependant on the County library may only have a more limited 30-day review period due to the restricted library hours and holidays. These documents are too complex for the average person to review in that amount of time. It would have been a more publicly accessible document if it had been released so the review period didn't overlap the Thanksgiving, Christmas and New Years holidays when many people are busy with families or out of town.

Although we felt the General Plan is lacking in several ways we find it is a refreshing change from the old General Plan, creating in the early 1980s. So much has changed. According to the research by True North Research, Inc. for 2009, when presented with a series of environmental initiatives that could be considered by the City, 90% of those polled selected acquiring and preserving additional natural open space as being important. (Attachment 1: Page 5 from report prepared by True North Research, Inc, 2009 for City of San Marcos General Plan)

E15-2

Open space, considered in the old General Plan as "underutilized land", is now seen as an amenity -something of value. Since the 1980s San Marcos, due to rapid growth, has lost many of its open space lands leaving the remaining lands fragmented and degraded. The joy of good planning is that it can eventually fix some of the problems previously created. It is not easy and it may take several generations but it is possible. Brown fields can become green fields with open space parks. Take for example, the Baldwin Hills Scenic Overlook in Los Angles. This formerly degraded spent oil field is now a treasured open space park. Recent revegetation has resulted in some of the native wildlife returning to the site. Restoration of damaged habitat is good, but it is much less costly to preserve nature than it is to restore it.

E15-3

Because both documents are related we will try to indicate with each comment if it is for one or both documents. For the record, although the Summary states, "...*City of San Marcos initiated a collaborative program to complete a comprehensive update of its General Plan*", the Twin Oaks Valley Sponsor Group, a citizens advisory group appointed by the County Board of Supervisors, was not invited to be involved in the General Plan Advisory Committee. That is unfortunate when you consider there are members the Sponsor Group

## **E15 Twin Oaks Valley Community Group, Gil Jemmott**

Note: The author of this letter references six different attachments. These attachments were not included with the comment letter. The City has requested them from the author, but has not received them yet. As such, responses to the attachments are not included in the responses to comments below.

- E15-1 Comment noted. The City acknowledges that the timing of the document release was inopportune and apologizes for the inconvenience; however, the City did comply with the legal requirements for public review of the Draft EIR pursuant to CEQA.
- E15-2 Comment noted. No new questions or new information regarding the environmental analysis within the Draft EIR were raised; therefore, no further response is required.
- E15-3 At the onset of the General Plan update, the City Council appointed a representative from every community, including Twin Oaks Valley, to serve on the General Plan Advisory Committee (GPAC). Over the life of the project, there have been 24 GPAC meeting, all of which were open to the public and announced on the General Plan project website in advance of the meeting. All agendas and items discussed during these meetings are posted on the project's website at <http://www.ourcityourfuture.com/general-plan-advisory-committee>.

E15-3 Cont. who have over ten years experience with the County's General Plan. We do, however, appreciate Staff informing us of the GPAC meetings and taking time to meet with members of the sponsor group towards the end of the process. I would like to say that I often agreed with Staff over the recommendations of the GPAC committee, especially with Staff's recommendations for areas along the SR78 corridor. Sadly, it appears that the DEIR failed to address several of the comments to the NOP from the County, the Twin Oak Valley Community Sponsor Group, or the Wildlife Agencies.

E15-4

About 10 years ago, when the general plan was being updated, we requested that a rollback of the sphere of influence to the then current city boundaries be studied. Richard Gittings, who was the city manager at the time, said that the planning had progressed too far for this to be done, but that this would be included in the next general plan update.

E15-5

In our letter responding to the most recent NOP, we asked that one of the alternatives to the General Plan show the roll back of the San Marcos Sphere of Influence (SOI) to the City's current boundary and identify the associated environmental impacts. This valid project alternative was AGAIN not studied and we ask that the EIR be withdrawn and revised to include this analysis. Waiting another 10 years is unacceptable.

We believe that removing the impacts associated with the implementation of the General Plan in our planning area would reduce the cumulative negative environmental impacts for both those impacts in the City of San Marcos and those in the unincorporated SOI (sphere of influence). We ask that all land use designations for the City of San Marcos in the SOI areas match the land use designation of the recently adopted County General Plan. As we will discuss later in our comments there are areas where the City's land use under it's General Plan is dramatically different and will have significantly more negative impacts (under CEQA) than the County's designation.

E15-6

Unfortunately, there has been a lengthy and troubled history between the Twin Oaks community and the City of San Marcos regarding problems associated with the old General Plan and its outdated land use designations. This is especially true in light of the fact that some of the new planning logic is left out of the new version of the General Plan. If implemented, the proposed General Plan would significantly impact the Twin Oaks Valley Community planning area and other SOI areas of the adopted North County Metro General Plan/ County General Plan.

E15-7

Much of the Twin Oaks Planning Area is within the SOI of the City of San Marcos. We notice that throughout the General Plan and DEIR there are discussions regarding planning for the SOI areas and yet several of the maps do not show the resources or constraints within the SOI areas. For instance, Figure 4-2/ 3.4-4 Wildlife Corridor and Linkage shows no wildlife corridors outside the City limits and yet there is wildlife present and there are recognized wildlife corridors within the portion of our planning area that is within the City's SOI. This same observation can be made regarding Figure 3.1-1, Figure 4-3/4.3-2 Open Space Areas and Figure 4-5 Scenic Resources. In addition, San Marcos Creek and its tributaries along the northern portions of Twin Oaks Valley Road and along Deer Springs Road as well as, Buena Creek and their tributaries didn't appear to be included on Figure 4-8 in either the Draft General Plan or DEIR. These water courses should be included because inappropriate planning in the SOI could significantly impact these creeks. Also

- E15-4 The City considered all comments received during preparation of the Draft EIR, including those received on the NOP in accordance with CEQA Guidelines Section 15084(c).
- E15-5 Section 15126.6 of the CEQA Guidelines requires that an EIR “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” The emphasis is added to stress that the alternatives analysis should look for ways to further mitigate the effects of the project. Thus, the selection and analysis of project alternatives presented in this section do not include any alternatives that assume intensification of development beyond that associated with the General Plan. The suggested alternative was not analyzed in the Draft EIR because it would not reduce significant environmental impacts of the Project (Draft General Plan). Growth and development would continue to occur within City limits and the unincorporated areas within the County’s jurisdiction. It is unclear how limiting the planning area to remove the unincorporated area with the SOI would lessen significant environmental impacts of the implementing the Draft General Plan.

As described in Section 3.10.2, LAFCO regulates local agency boundary changes including annexation of unincorporated land into incorporated cities. Because these areas are not yet under the jurisdiction of San Marcos, the land use designations within the SOI do not have to match the General Plan land use designations for these areas. Please refer to Section 3.10.4 of the Draft EIR for a comparison between the County of San Diego General Plan land uses with the proposed land uses set forth in the San Marcos General Plan.

E15-6 Comment noted. Please refer to Response to Comment E15-7 below.

E15-7 The Draft EIR examines impacts to the planning area as a whole, including both the areas within the corporate city limits and the Sphere of Influence (SOI), as identified in Section 2.2 of the Draft EIR. It is correct that some of the maps included in the General Plan and EIR limit resources shown to those within the corporate city boundary, while others include resources within the SOI as well. Where data is available, the City will revise the General Plan and EIR maps to show resources within the SOI.

E15-7  
Cont.

included in the planning should be drainage areas that may be outside of the SOI but drain directly into the SOI creeks and flood plains since these upland areas can carry significant pollutants and siltation into waterways. If the General Plan identifies and discusses the SOI areas then the resources, and impacts to resources, of the SOI areas should also be discussed and identified in the written portion and the corresponding Figures.

E15-8

There is an inherent problem with Program EIRs. They need to be general because projects haven't come forward with detail necessary to foresee all or sometimes even some of the impacts. Yet we know there will be impacts. San Marcos has had explosive growth since the 1980s and evidence of both good and bad land use decisions provide opportunities for study and reflection. Because we now have examples of how past land use through the old General Plan has impacted the community we have the tools needed to be more specific and less general in both the DEIR and General Plan. Below are three examples.

E15-9

1. San Marcos has many off ramps and on ramps to SR78. This is convenient, but during peak traffic hours, the far right lanes of SR 78, especially eastbound, function more as extensions of the on and off ramps than actual thru travel lanes. In these areas, people are trying to merge onto the freeway in a very short distance, while other commuters are desperately trying to get off the freeway. It creates a dangerous situation. It also, reduces the capacity of SR78 because the traffic in the right hand lane must travel at reduced speeds to accommodate all the added activity of vehicles trying to get on and off the freeway. It creates a domino effect, reducing traffic speeds and adding congestion through San Marcos. We would appreciate a discussion in either the General Plan or DEIR that addressees the impacts the General Plan will have regarding this specific issue and how it will be mitigated. As San Marcos grows this problem will get worse. The General plan should detail the design changes and land use changes that will help fix this problem. This is an important issue for Twin Oaks because commuters trying to bypass the congestion in San Marcos use Buena Creek Road. We don't believe that the Las Posas Road connection to Buena Creek Road will correct this issue because the SR78 / Las Posas Road connection design for the east bound on ramp and off ramp is so confusing and because it is too close to the Rancho Santa Fe on ramp.

E15-10

2. Additional detail is needed to assure proper wildlife corridors are provided around roadways. It is commonly known that adequate wildlife undercrossings under roadways are important to protect not only wildlife but also people. Large animals such as mule deer and mountain lions can do a lot of damage to vehicles and potentially passengers when collisions occur. We know wildlife undercrossings are important for safety. The knowledge exists to design undercrossings to work properly. This information is available through numerous studies, the Wildlife Agencies, the Biological Goals and Guidelines of the MHCP and other sources. Sadly, due to the very high mortality rate of wildlife along Twin Oaks Valley Road between Cal State San Marcos and San Elijo Road after the road was opened, we know what happens when either no undercrossing or an insufficient or badly designed undercrossing is built. Since the road crosses and obstructs a known wildlife corridor, the outcome was predictable. Therefore, the General Plan and DEIR should discuss this issue and under Goals and Policies discuss what measures will be used to allow wildlife to move through the open space safely.

E15-8 Comment noted. Please see Response to Comments E15-9 though E15-12.

E15-9 See Response E6-3 related to operations along SR-78. It should be noted that the General Plan supports RTP policies related to auxiliary lanes and other planned improvements along the SR-78 corridor. Additionally, the General Plan contemplates additional capacity over SR-78 to provide better connectivity for the City which should assist in some improvements to the interchanges. Additionally, the City is working with Caltrans, including collection of fees for improvements to SR-78, which will provide improvements along the corridor. It should be noted that, given the general nature of the General Plan, specific improvements to interchanges has not been identified. However, the City, in cooperation with SANDAG and Caltrans, will continue to investigate and identify improvements along this corridor through the required Caltrans Project Development process.

E15-10 The Conservation and Open Space Element includes a discussion of wildlife corridors and habitat linkages throughout the planning area. General Plan Policies COS-1.1, COS-1.2, and COS-1.3 aim to support and enhance significant ecological and biological resources within San Marcos and its adaptive Sphere of Influence, including wildlife corridors and habitat linkages. Policies COS-2.1 and COS-2.2 aim at protecting open space from conversion to urban uses. Section 3.4 of the Draft EIR also includes a discussion and analysis of impacts on wildlife corridors. Mitigation Measures BR-3 and BR-5 would be implemented to mitigate impacts related to wildlife corridors and habitat linkages, as discussed in Sections 3.4.5 and 3.4.6 of the EIR.

3. A final example would be the need for residential planning in steep slope areas that so that it does not increase the failure of the slope. We know that much of San Marcos has a thin layer of topsoil overlaid on an easily fractured rock base. Cuts into this rock face, exposing it to wind and water through participation cause the rock to erode, eventually breaking free and falling. Without topsoil, there is little that will grow to protect the rock face from eroding further. We see evidence along the slopes at the base of the south side of Owens Peak. Here the rock has fallen into back yards and in some spots chain link fence is used to hold the hillside. Attempts to vegetate these areas are problematic. We think it would be good for the General Plan and DEIR to discuss this issue and have goals and policies to prevent inappropriate cuts to hillsides that create or accentuate this problem. We ask that a policy be added to the Conservation And Open Space Element/ Protecting Scenic Resources and Landform Features Goal COS-3, Protect natural topography to preserve and enhance the natural beauty of San Marcos that states: "Discourage grading that leaves large exposed rock faces and allow grading that is in harmony with the natural topography of the area."

Therefore, although this is a Program EIR we believe that when there is evidence of impacts, from implementation of past projects under the existing General Plan, these impacts are now considered foreseeable they should be studied in context to the land use changes under the proposed General Plan. A jurisdiction cannot hide under the skirt of a Program EIR when it is foreseeable that the implementation of the General Plan will have impacts made known through the outcome of past projects. We don't think the DEIR has met the criteria under CEQA "*to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided*" (Public Resources Code Section 21002.1/aff.)

#### Comments to Section 3.10 Land Use And Planning

Noted on 3.10-2, Table 2.10-1, Existing Land Use Acreage, 2009, is that San Marcos has 11.8% or 2,299 acres of the total 21,161 acres of it's planning area in Open Space (parks and conservation). Since this figure includes the 5,629 acres of unincorporated land within the City's SOI, we would like to know how much of the 11.8% open space is within the SOI? Also, how much of this SOI is within the Twin Oaks Valley Planning Area.

#### Comments to College Area Neighborhood and Specific Plan Areas.

A portion of the College Area Neighborhood and one SPA, the San Marcos Highlands SPA is in the SOI of the Twin Oaks Community Planning Area. This area was designated as an SPA in 1991, encompasses approximately 297 acres and given a density based upon planning logic that was common at that time. Since then many things have changed both in our knowledge of good land use planning and governmental regulations. Therefore this SPA along with other older SPA need to be evaluated under what is now known and the guiding principals of the proposed General Plan. The impacts of these projects need to be discussed in the DEIR. This has not been done.

The Highlands SPA land use designation is in conflict with the County's land use designation. The County's designation is 1 du per ten acres under the adopted General Plan and the rational for this designation is attached. Attachment 2: County assessment of San Marcos Highlands for General Plan) In the previous General plan the density and level of

E15-11 The General Plan includes Policy COS-3.3 within the Conservation and Open Space Element which indicates that the City will continue to work with new development and redevelopment project applicants in designing land use plans that respect the topography, landforms, view corridors, wildlife corridors, and open space that exists. In addition, Implementation Program COS-1 requires the City to continue to enforce the Ridgeline Ordinance which was established to minimize the physical impacts to ridgelines and hillsides. Further, the City has established a Ridgeline Overlay Zone, and requires a Ridgeline Development Permit (“RDP”) to be approved by the City Planning Commission for two (2) or more residential dwellings before any grading, construction or development can occur within the Ridgeline Overlay Zone. As such, the City appreciates the suggested policy language; however, it will not be added to the General Plan as existing proposed policies and implementation programs encompass the intent of the suggested language.

E15-12 The Program EIR for the proposed General Plan examines the changes from existing conditions to a future expected development capacity pursuant to the proposed the General Plan, and analyzes impacts based on this change. Past projects implemented under the existing General Plan are assumed as part of the overall existing conditions and are taken into account throughout the analysis within the EIR.

E15-13 Table 3.10-1 cites the correct number of existing open space acreage, which is 2,499 acres or 11.8 percent of the planning area. The planning area was examined as a whole throughout the EIR and separate open space calculations were not provided by individual neighborhood or differentiated between the corporate city boundary and the SOI for any of the analysis in the EIR. No further response is required because this comment does not raise a specific question regarding the environmental analysis in the EIR.

E15-14 The San Marcos Highlands Specific Plan has been approved by the Planning Commission and City Council and has met all entitlement requirements. The Specific Plan has undergone previous environmental review in 1990 with certification of a Final Environmental Impact Report and again in 1999 with certification of a follow-up Mitigated Negative Declaration. These environmental documents provide project-specific mitigation measures to reduce and mitigate impacts associated with the implementation of the Specific Plan. However, the tentative map on file for this Specific Plan has expired and no development has occurred in this area to date. At the time that a new tentative map is presented to implement this Specific Plan, it will go through the appropriate administrative review and taken before the Planning Commission for approval.

As shown in Appendix D-1 of the General the Draft EIR assumes 230 single-family in the San Marcos Highlands Specific Plan Area. This is included in the expected development capacity for the General Plan, as shown in Table 2.0-2 of the Draft EIR, and

is therefore analyzed as part of the overall General Plan program assessed throughout the document.

E15-15 See Response to Comment E15-14.

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E15-15  
Cont.

impacts designation was much lower than under the SPA. The County's designation was due to the steep slopes and sensitive resources of the site. The area is the headwaters of Agua Hedionda Creek and shown as a Focused Planning Area in the Federal Register for the MHCP. It is a recognized wildlife corridor and a Pre Approved Mitigation Area for the County's North County MSCP. Due to the environmental constraints a proposed project for the site, known as The San Marcos Highlands Project received strong objections from governmental agencies including, the Department of Fish and Game, US Dept of Fish and Wildlife, EPA, San Diego County DPLU and the Twin Oaks Valley Community Sponsor Group. The portion of this SPA that is within the SOI of the Twin Oaks Planning Area is adjacent to rural low-density development and the implementation of the SP at the current designation would divide the existing rural community that abuts the site on three sides. 23

This SPA is problematic and the issues are well documented in the comments to the San Marcos Highlands, NMD, MND, SEIR, DEIR and these documents are incorporated by reference into these comments. Attachment 3: Past comments from agencies. We ask the consultant preparing these documents review all biological documents and governmental comments on file regarding The San Marcos Highlands Project Specific Plan and then discuss these impacts within the context of the General Plan and EIR. It appears this SPA designation is in conflict with other elements goals and policies of the proposed General Plan. The SPA density should be reconsidered since this General Plan is a "constitution for future development" and clearly the Specific Plan for this site is problematic.

#### Comments to Surrounding Land Uses

E15-16

For the unincorporated areas adjacent to the City of San Marcos and in the SOI please include the land use designations and identify each parcel that is in Conflict with the County General Plan. Please discuss how the DEIR address impacts to surround unincorporated communities. All impacts, not just those impacts to current San Marcos residents need to be identified. Because in some areas of the General Plan and DEIR it talks about planning for the SOI areas while in other areas discussions are limited to within the existing City limits it is not clear if the DEIR has fully considered impacts of the proposed General Plan on SOI and adjacent incorporated areas. This clarification needs to be provided as part of this document.

#### Comments to Multiple Habitat Conservation Plan (MHCP)

E15-17

Please discuss why the USF&WS and CDF&G have not approved the San Marcos Draft Sub-area plan and discuss deficiencies and concerns raised by the Wildlife Agencies in the response to comments to the Notice of Preparation for this General Plan. Please demonstrate how the proposed San Marcos Subarea Plan, P.O. 20-23, also known as the Murai Property, and lands with Vernal pools along Las Posas as well as other lands with sensitive resources meets Biological Goals and Guidelines of the MHCP.

E15-18

E15-16 Please refer to Section 3.10.4 of the Draft EIR for a comparison between the County of San Diego General Plan land uses with the proposed land uses set forth in the San Marcos General Plan. The Draft EIR examines impacts to the planning area as a whole. This includes the both the area within the corporate city limits and the sphere of influence, as identified in Section 2.2 of the Draft EIR.

E15-17 It is not the decision of USFWS or CDFG to approve the San Marcos Sub-area plan. This comment requires further response from the City. This response will be provided by 1/17/2011 and will be included in the final version of this Response to Comments Appendix.

CDFG was the only wildlife agency that submitted a comment letter during the NOP comment period. The comments provided in that letter were considered in accordance with CEQA Guidelines Section 15084(c).

E15-18 Please refer to Mitigation Measures BR-1, BR-2, BR-9 and BR-10 (BR-9 and BR-10 were previously numbered BIO-8 and BIO-9, respectively, in Draft EIR) for measures to ensure General Plan consistency with habitat conservation planning, including the MHCP.

E15-19

Please show how the MHCP will link to Pre Approved Mitigation Areas in the County within the Twin Oaks Planning Area and to areas set aside for open space by the County that may be impacted by the implementation of the proposed General Plan. For example, the Tai Estates and recently approved Sugarbush TM (SP03-003-FEIR) (Attachment 4: Aerial view of Sugarbush TM) set aside areas for open space and a 500-foot wide corridor to connect areas that abut the San Marcos Highlands SPA. It is important to provide adequate wildlife movement from the San Marcos Highlands SPA to other open space areas to assure that cut-off areas of habitat are not created. This connection or discussion of connections to nearby open space areas is not addressed in either the proposed General Plan or DEIR.

E15-20

The General Plan should address the orphaned properties within the City associated with the judgement on disposition of the The Environmental Trust Properties. (Attachment 5: aerial view with TET properties near Owens peak) These properties were set aside through the development phase. San Marcos has trails and access easement across some of the properties and they were included as part of the subarea plan for the MHCP. P Mountain, shown on page 4-22 of the Conservation and Open Space Element is one of these properties. The most recent information we have indicates that San Marcos declined to take position of these properties. There is concern that these properties, now owned by the State, could be stripped of their open space designation and sold for development. Considering the financial situation of the State of California we are concerned this will likely happen. Both the General Plan and DEIR should discuss the former TET properties, show their locations, and address how they impact the San Marcos' subarea plan for the MHCP. A discussion as to their management should be included. This is an important issue for our planning area. First, because policies and actions by the City of San Marcos would directly impact our planning area if we were to be annexed to the City in the future. Secondly, these properties form part of San Marcos MHCP subarea plan of lands through the San Marcos Mountains that need to connect to the PAMA areas of the North County MSCP.

**Comments to 2050 Regional Transportation Plan/Sustainable Communities Strategy (2050 RTP/SCS)**

E15-21

Please provide a graphic noting which areas within the city are within  $\frac{1}{2}$  mile (average walking distance, not direct line point to point distance) to public transportation facilities and discuss how areas outside walking distance will be served so that green-house gases and air pollution will be reduced. Describe what policies will be implemented to reduce pollution from automobile traffic in the Twin Oaks Valley area and along SR78.

**Comments regarding Division of an Established Community and Conflict with an Adopted Land Use Plan**

E15-22

As previously discussed, the San Marcos Highlands SPA both divides the established rural community that is to the north and north-west of Santa Fe Hills, and within the Twin Oaks Valley Community Planning Area and conflicts with the County's adopted land use plan.

**Comments to 3.16 Transportation and Traffic**

E15-19 The intent of Figure 4-3 in the General Plan is to show the areas designated as Open Space within the planning area. The City is aware of the County Preapproved Mitigation Areas (PAMA) for the North County MSCP; however, Figure 4-3 will not be revised to include these areas. Wildlife corridor linkages from San Marcos to surrounding conservation areas are illustrated in Figure 3.4-4. Open space areas within the City that demonstrate clear connections to surrounding adjacent areas are documented in Figure 3.4-2.

E15-20 The City acknowledges that the identified parcels are preserve areas and they will be added to the Open Space map in the Final General Plan and EIR documents (Figure 4.3 in the General Plan and Figure 3.4-4 of the EIR). BY virtue of their open space designation, development would not be allowed in these areas.

E15-21 Transit facilities, including the proposed shuttle system, are presented in the Mobility Element. The General Plan also focuses a large percentage of growth in the core of San Marcos with mixed use development, all in an attempt to reduce vehicle trips and vehicle miles traveled, which is a precursor to greenhouse gas emissions. Additionally, the Mobility Element places a tremendous emphasis on complete streets, prioritizing alternatives modes of travel, and promotes modes of travel other than the single occupant vehicle. These policies include Policy M-1.3, M-1.4, M-1.6, M-1.7, and Policies M-3.1 through M-3.9.

E15-22 The San Marcos Highlands Specific Plan Area is currently vacant and provides no direct access between the various residential developments surrounding the site. Development of this area would not divide an established community.

E15-23 As previously discussed, the numerous and closely spaced on and off ramps create problems on SR78 and need to be addressed in the DEIR.

E15-24 On page 3.16-32, It states, "Las Posas Road/SR-78 Westbound Ramps – PM Peak Hour – The City is implementing flexible LOS standards at this intersection to reduce impacts for pedestrians and bicycles through the corridor and minimize impacts to the urban environment. Therefore, although it is congested during the PM peak hour, the project impact is considered less-than-significant. " Please describe how this will be done. What is a flexible LOS standard?

E15-25 It also states, "Buena Creek Road/Twin Oaks Valley Road – AM and PM Peak Hours – The impact is considered significant and mitigation is required". What mitigation will be used and what impacts will it have on the Twin Oaks Valley Community Planning Area?

E15-26 On page 3.16-34&35, Table 3.16-7, **Proposed General Plan Intersection Level of service**, several roads both within and adjacent to the Twin Oaks Valley Planning Area as service level F both under existing and proposed conditions. Clearly with over forty years of disclosure and mitigation under CEQA under our belts we would have not allowed this situation to occur! The proposed General Plan would significantly add to the misery commuters feel during evening commutes along Twin Oaks Valley Road at Borden Road and Buena Creek Road. Please explain the factors that created this result and discuss if the proposed General Plan will only add to the problem.

E15-27 Table 3.16-8 **Proposed General Plan Daily Roadway Volumes and Levels of Service** shows Twin Oaks Valley Road north of Windy Way to drop from LOS D to LOS E if the proposed General Plan is implemented. How will this be mitigated? We disagree with SANDAG that LOS E is acceptable and believe when traffic does not move freely that it only exacerbates green house gas emissions, and noise problems and is harmful to residents. The impact is not less than significant if you just lower the standards. Lowering standards to get compliance is not a good solution. Please explain how LOS is acceptable to commuters and will help the City address Green House Gas and air pollution issues? Green house gases caused by traffic congestion make population density, Circulation Element, and need to meet reduce greenhouse gasses linked and should be addressed in the General Plan and DEIR.

E15-28

#### Comments to the Conservation and Open Space Element

E15-29

In both the General Plan and DEIR there is an error in at least one of the wildlife corridors. In Figure 4-2, Wildlife Corridor and Linkage doesn't show a wildlife corridor along Agua Hedionda Creek, which is a recognized wildlife corridor. Instead the corridor is shown along the San Marcos Mountains ridge. Animals using wildlife corridors tend to follow creeks due to the presence of water, foraging opportunities and cover supplied by the riparian canopy. Not as many animals use ridgelines where there is little water, not much food, and little cover from predators. Please refer to the MIHCP Biological Goals and Guidelines as well as documents from Wildlife Agencies and the EPA in response to the San Marcos Highlands Project, DEIR, SEIR, MND, ND, etc. Also refer to the Agua Hedionda Creek Management Plan.

E15-23 Please see response E15-9.

E15-24 Policy M-1.4 of the Mobility Element describes this process, which is summarized below:

The City shall allow for flexible LOS where warranted (e.g. accepting a lower LOS than identified above). Warranted locations include those within the Urban Core of San Marcos, or where widening is considered infeasible (financially or environmentally). The City shall continuously update a list of protected locations where flexible LOS is warranted, including Rancho Santa Fe Road (between Grand and Linda Vista, and between Grandon Ave. and Security Place), and Twin Oaks Valley Road (north Windy Way).

This policy is supported by the City desire to implement complete streets within the City.

E15-25 Improvements to this location are summarized in Mitigation Measure TT-1. The mitigation includes adding capacity to the eastbound approach to the intersection.

E15-26 Please see response 13-3 regarding impacts to county roads in this area. Mitigation Measure TT-1 identifies improvements to intersections in this area to mitigate the project impact, including the addition of an eastbound left-turn lane and some signal phasing modifications. This mitigation measure will provide acceptable LOS and mitigate the impact to a less than significant level. The reduced service levels are associated with future growth along the corridor.

E15-27 LOS E for roadway segments represents “at capacity” operations. As such, the roadway is designed to accommodate the peak traffic characteristics and, because it will operate at capacity, traffic will not be able to “move freely.” However, the flexible LOS standard implemented in this area will protect some of the sensitive habitat in the area and will enhance bicycle and pedestrian travel in the area by not allowing the roadway to become widened. Additionally, when lane capacity is added, vehicle miles of travel typically increases, thus increasing greenhouse gas emissions. The flexible LOS standard is supportive of the City’s complete streets policies and policies to promote alternative modes of travel in the City.

E15-28 Refer to Response to Comment E15-27 for a discussion related to LOS standards. Regarding greenhouse gas (GHG) emissions, Section 3.7 of the Draft EIR provides a complete discussion of GHG Emissions and analyzes impacts related to implementation of the General Plan. Section 3.7.4 includes a quantitative analysis of construction and operational GHG emissions associated with both mobile (i.e., traffic and transportation-related) and stationary sources associated with implementation of the General Plan. Section 3.7.5 contains program-level mitigation measures to help reduce impacts related

to GHG emissions. Further, the General Plan contains policies and implementation programs throughout the following Elements that aim to reduce GHG emissions that contribute to climate change: Land Use and Community Design; Mobility; Conservation and Open Space; and Parks, Recreation, and Community Health.

E15-29 The Agua Hedionda Creek wildlife corridor will be added to Figure 4-2 in the General Plan and Figure 3.4-4 in the EIR. It should be noted that Agua Hedionda Creek wildlife corridor is designated as Open Space in the General Plan, as shown on Figure 4-3 in the Conservation and Open Space Element of the General Plan. By virtue of its Open Space designation, development will not be allowed within this corridor. This area is part of the San Marcos Highlands Specific Plan Area and appropriate mitigation measures form the environmental documentation prepared for the Specific Plan are required to be implemented to protect this area. Please refer to Response to Comment E15-14 for further discussion of the San Marcos Highlands Specific Plan.

E15-30 Since this document covers planning for SOI areas, the elements of the General Plan should also cover these areas. Figure 4-2 does not show San Marcos creek that is on the south side of Deer Springs Road or other creeks in the Twin Oaks Valley Planning Area. Please add these features to the documents. Because the creek designator color is so pale it does not have sufficient contrast against the background. It should be increased so that it is easy for the public to see, especially those who are vision impaired.

E15-31 In Figure 4-3, Open Space Areas in both General Plan and DEIR the areas designated for General Plan Open Space Use do not show a connections to other open space areas set aside for conservation by the County that are to the North west of the northern portion along Agua Hedionda Creek. The County designated portions of the Sugarbush project for habitat open space. There needs to be an east west corridor connection between the San Marcos Mountains and the Mountain range that is just south of Buena Creek Road. Figure 4-3 should also show County Pre Approved Mitigation Areas (PAMA) for the North County MSCP. (Attachment 6: PAMA map for the unincorporated areas near San Marcos)

E15-32 Illegal off-road vehicle can damage habitat and cause erosion in open space. An example of this occurs on P Mountain shown on page 4-22 of the Conservation and Open Space Element. We ask that a Goal of the Conservation And Open Space Element be:

“Work with Law Enforcement and the Community to eliminate damage to open space areas and actively pursue illegal off road vehicle activity in parks and open space areas.”

E15-33 Figure 4-3 doesn't show any areas set-aside in the Twin Oaks Valley Planning Area for opens space use in the General Plan. If the City plans to one day annex these areas then it should show both recreation and open space. Or, it should present alternative showing the SOI rolled back to the existing City boundaries. This comment also applies to Figure 4-5, Scenic Resources. It needs to be addressed to make elements of the General Plan comply with Goal COS-1 on page 4-22 of the General Plan, Identify, protect, and enhance significant ecological and biological resources within San Marcos and its adaptive Sphere of Influence.

### **Watershed and Water Quality Protection**

E15-34 Both the General Plan and DEIR do not evaluate the findings of the Agua Hedionda Creek Watershed Management Plan. The study and associated Plan should be noted and considered in this section of the San Marcos General Plan and DEIR.

E15-35 In the implementation of the Santa Fe Hills project the City allowed the developer to take runoff from streets and use Agua Hedionda Creek as a storm drain. How will issues like this be corrected so that the City can comply with water quality policies? How will Goal COS-6 be implemented?

E15-36 Please note in the General Plan and DEIR that the headwaters of Agua Hedionda Creek are within the College Area Community Plan.

E15-37 In Figure 4-9, 303 (d) Listed Water Bodies, please show impaired creeks and water bodies in the SOI areas, and the areas that drain into these listed water bodies.

E15-30 Please refer to Response to Comment E15-7.

E15-31 Please refer to Response to Comment E15-19.

E15-32 The City has developed a sign program which implements signs adjacent to trailheads to disclose the intent of the trail uses (i.e., walking, biking, equestrian) and deter illegal off road vehicle activity on the City-maintained trails. This comment requires further response from the City. This response will be provided by 1/17/2011 and will be included in the final version of this Response to Comments Appendix.

E15-33 As shown on Figure 4-2 of the General Plan, the land use designations in the Twin Oaks Valley Neighborhood outside the corporate city limits (within the SOI) are mainly agricultural/ residential, hillside residential, and rural residential. It is correct that none of these land use designations in this portion of the SOI specifically designate areas as open space; however, these land use designations are extremely low density residential with the density often dependent on slope. Please refer to Table 2-3 in the General Plan for a description of the allowed uses in these land use designations. Figure 4-3 does illustrate areas designated as open space along Agua Hedionda Creek within the area designated as Specific Plan Area (SPA) (San Marcos Highlands Specific Plan). Upon development of this SPA, this area will be required to be consistent with this open space designation.

E15-34 Please see Response to Comment E8-3. This comment requires further response from the City. This response will be provided by 1/17/2011 and will be included in the final version of this Response to Comments Appendix.

E15-35 The Santa Fe Hills project (Paloma TSM 302) implemented the regulatory requirements associated with water quality that were required prior to and during the 2001 Municipal Stormwater Permit. Only a small portion of the project, the northwestern most portion drains to the Agua Hedionda Creek. Of this part, one phase, roughly 30 percent, did not fall under the 2001 Municipal Permit requirements as it was constructed prior to the 2001 permit. The adjacent phase which is roughly 70 percent of the portion that drains to the Agua Hedionda Creek implemented the required treatment train consisting of structural water quality treatment controls to treat the 85th percentile of urban runoff prior to leaving the site (19 curb inlet filters and one hydrodynamic separator). In addition, the City of San Marcos Engineering requires that post flows do not exceed pre flows for both phases of the project prior to outlet to any channel either natural or manmade.

The City currently adheres to all requirements for all projects identified as priority development projects under the 2001 and 2007 Municipal Stormwater Permit and any future municipal permit requirements will also be implemented through the City's local SUSMP as they have been since 2001.

The City is implementing watershed wide policies through the Draft General Plan through COS-6, COS7, COS 8, and COS 9. These clearly identify management planning for all sub watersheds in the planning area. The City has already begun this process through the Upper San Marcos Creek Watershed Management Plan.

E15-36 The Draft General Plan does not list the headwaters of every creek within the planning area; rather, they are shown on Figures 4-1 and 4-2, as well as various other figures throughout the General Plan. Table 3.9-1 in the EIR acknowledges that 773 acres of the Agua Hedionda Creek Watershed fall within the College Area Neighborhood; this includes portions of Agua Hedionda Creek.

E15-37 Figure 4-9 in the General Plan and Figure 3.9-1 in the Draft EIR show all currently 303(d) listed impaired water bodies in the SOI areas and the areas that drain to them.

DRAFT

E15-38

23

Thank you for the opportunity to comment on these very important documents. Please feel free to contact for any questions or if you need copies of any documents referenced in our comments.

Sincerely,

Gil Jemmott, Vice Chair

Cc:  
attachments

E15-38 This comment provides closing remarks and no further response is necessary.

DRAFT

E16



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA

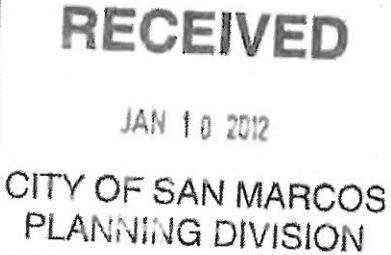
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



January 5, 2012

Garth Koller  
City of San Marcos  
1 Civic Center Drive  
San Marcos, CA 92069-2918

Subject: General Plan Update  
SCH# 2011071028



Dear Garth Koller:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 4, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

E16-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
(916) 445-0613 FAX (916) 323-3018 [www.opr.ca.gov](http://www.opr.ca.gov)

Document Details Report  
State Clearinghouse Data Base

24.

**SCH#** 2011071028  
**Project Title** General Plan Update  
**Lead Agency** San Marcos, City of

**Type** EIR Draft EIR

**Description** The proposed project analyzed in this Draft Program EIR is the comprehensively updated City of San Marcos General Plan. The City's General Plan has not been updated since 1988. The updated program builds upon the vision established in the City's existing General Plan and responds to the evolving needs and objectives of the community. The updated General Plan includes the seven state mandatory elements and one optional element: land use and community design; mobility; conservation and open space; parks, recreation, and community health; safety; noise; and housing. The Housing Element is not being updated at this time. The Draft Program EIR analyzes impacts associated with the implementation of the updated General Plan.

**Lead Agency Contact**

<b>Name</b>	Garth Koller
<b>Agency</b>	City of San Marcos
<b>Phone</b>	(760) 744-1050 x3231
<b>email</b>	
<b>Address</b>	1 Civic Center Drive
<b>City</b>	San Marcos
	<b>State</b> CA <b>Zip</b> 92069-2918
	<b>Fax</b> (760) 591-4135

**Project Location**

<b>County</b>	San Diego
<b>City</b>	San Marcos
<b>Region</b>	
<b>Lat/Long</b>	33° 8' 31" N / 117° 10' 13" W
<b>Cross Streets</b>	SR 78 (Nordahl Road to Rancho Santa Fe Road)
<b>Parcel No.</b>	Bks 182, 184, 217-224, 226, 228, 229, 679
<b>Township</b>	
	<b>Range</b>
	<b>Section</b>
	<b>Base</b>

E16-1  
(Cont.)

**Proximity to:**

<b>Highways</b>	Hwy 78
<b>Airports</b>	McClellan-Palomar
<b>Railways</b>	NCTD ROW/BNSF
<b>Waterways</b>	San Marcos Creek
<b>Schools</b>	SMUSD
<b>Land Use</b>	Various Residential, commercial, industrial, recreational, open space, and Specific Plan areas land uses, designations, and zones.

**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Office of Emergency Management Agency, California; Caltrans, Division of Aeronautics, California Highway Patrol; Caltrans, District 11; Department of Housing and Community Development; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Note: Blanks in data fields result from insufficient information provided by lead agency.

Document Details Report  
State Clearinghouse Data Base

24.

E16-1

(Cont.)

*Date Received* 11/21/2011    *Start of Review* 11/21/2011    *End of Review* 01/04/2012

Note: Blanks in data fields result from insufficient information provided by lead agency.

**E16 Office of Planning and Research, State Clearinghouse and Planning Unit**

- E16-1 This letter acknowledges that the City of San Marcos has complied with State Clearinghouse review requirements for the San Marcos General Plan Draft EIR. No further response is required.

DRAFT

E17

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JAN 12 2012

EDMUND G. BROWN Jr. Governor

SAN MARCOS  
PLANNING DIVISIONFlex your power!  
Be energy efficient!

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

## DEPARTMENT OF TRANSPORTATION

DISTRICT 11  
4050 TAYLOR ST., MS 240  
SAN DIEGO, CA 92110  
PHONE (619) 688-6960  
FAX (619) 688-4299  
TTY 711

January 10, 2012

11-SD-78

Mr. Garth Koller  
City of San Marcos  
Planning Department  
1 Civic Center Drive  
San Marcos, CA 92069

RE: City of San Marcos "General Plan Update" Draft Program Environmental Impact Report

Dear Mr. Koller:

The California Department of Transportation (Caltrans) has reviewed the City of San Marcos "General Plan Update" Draft Program Environmental Impact Report. Caltrans has the following comments:

- The California Governor's Office of Planning and Research states the following regarding general law and policy concerning the relationship between Regional Transportation Plans (RTP) and General Plans (GP):
  - *When preparing or revising a General Plan, cities and counties should carefully analyze the implications of regional plans for their planning area. General Plans are required to include an analysis of the extent to which the General Plan's policies, standards, and proposals are consistent with regional plans.*
  - *The policies and plan proposals contained in the land use and circulation elements should reflect the RTP and Regional Transportation Improvement Program (RTIP). Clearly, transit standards, congestion management measures, proposed facilities, and transportation related funding may directly affect land use patterns and capital improvements. Although there is no explicit requirement that the RTP and RTIP be consistent with local general plans, good practice dictates that cities and counties should address these regional goals, policies, and programs to the extent they are relevant.*
- The city should cooperate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as

"Caltrans improves mobility across California"

## **E17 Caltrans**

- E17-1 The General Plan is consistent with the RTP, as it references facilities and services considered within the SANDAG RTP. Additionally, assumptions within the RTP are reflected in the EIR assessment as the regional SANDAG travel demand forecasting model was used for the assessment. As such, the General Plan is consistent and supportive of regional planning efforts.
- E17-2 Policy M-1.5 requires the City to coordinate with both SANDAG and Caltrans to adequately plan and fund the regional transportation system. Additionally, the City collects local funds for SR-78 improvements and currently coordinates with Caltrans on improvements to intersections within the City.

DRAFT

- E17-2 (Cont.) | coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on/off ramps is adequate.
- Caltrans recognizes that there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both total vehicle miles traveled (VMT) and the number of trips per household. Therefore, Caltrans encourages local agencies as part of their General Plan updates to work towards a safe, functional, interconnected, multimodal system integrated with land use planning that supports the concept of a local circulation system which is pedestrian, bicycle, and transit-friendly in order to enable residents to choose alternatives modes of transportation. Transit accommodations can be accomplished through the provision of park and ride facilities, bicycle access, signal prioritization for transit, or other enhancements, which can improve mobility and alleviate traffic impacts to State Route (SR-78). Such proposed accommodations in Caltrans right-of-way should be coordinated early with Caltrans staff ; contact Chris Schmidt, Caltrans Transportation Planning, Public Transit Branch (619-220-7360).
- E17-3 |
- SR-78 Corridor Study:** The San Diego Association of Governments (SANDAG) and Caltrans are currently working on the SR-78 Corridor Study for improving transportation and land use along the SR-78. The SANDAG project manager for the SR-78 Corridor Study is Rachel Kennedy (619-699-5638), and the Caltrans project manager is Robin Owen (619-688-2507).
- E17-4 |
- SANDAG 2050 RTP:** SANDAG has updated the RTP; the 2050 RTP has replaced the 2030 RTP. The 2050 RTP includes the addition of two Managed Lanes (ML) and Operation Improvements (OPS) on SR-78 from I-5 to I-15 to be built by 2020. With SANDAG's Sustainable Communities Strategy efforts in the 2050 RTP Update, per Senate Bill 375 (SB 375), Caltrans encourages the City to coordinate with SANDAG to address regional strategies to reduce greenhouse gases (GHG) and Vehicle Miles Travel (VMT).
- E17-5 |
- The California Complete Streets Act of 2008:** Beginning January 1, 2011, Assembly Bill 1358 requires that any substantive version of the circulation element of the general plan includes planning for a balanced multimodal transportation network that meets the needs of all users of streets, roads, and highways in a manner that is suitable to the context of the general plan. The Act defines all users as motorists, pedestrians, bicyclist, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation. Caltrans supports Complete Streets policies and continues to implement our own Complete Streets directive, DD-64-R1.
- E17-6 |

*"Caltrans improves mobility across California"*

E17-3 The Mobility Element supports the described linkages, as discussed in the Transportation Sustainability section of the element. As such, all policies, including the focus on Complete Streets, are consistent with what is described in this comment. The City will coordinate with Mr. Schmidt, as appropriate.

E17-4 Comment noted. The City will coordinate with these individuals as part of this effort.

E17-5 The City's plan was developed with an effort to reduce use of the single occupant vehicle. In addition, the land use plan reflects smart growth concepts and promotes a land use pattern that enhances community connections. As such, the plans, goals, and policies within the General Plan are generally consistent with the RTP and SCS. The City will continue to work with SANDAG in their regional planning efforts.

E17-6 The Mobility Element focuses on complete streets and the entire system is developed around this concept. The City appreciates Caltrans desire to embrace this concept.

REDACTED

Mr. Garth Koller  
January 10, 2012  
Page 3

25.

E17-7

- The cumulative project intersection Level of Service figure 3.16-9 for intersections 1-16 was mistakenly omitted from the report.

If you have any questions or require further information, please contact Jose Marquez at (619) 688-3193 or email at [jose.marquez@dot.ca.gov](mailto:jose.marquez@dot.ca.gov)

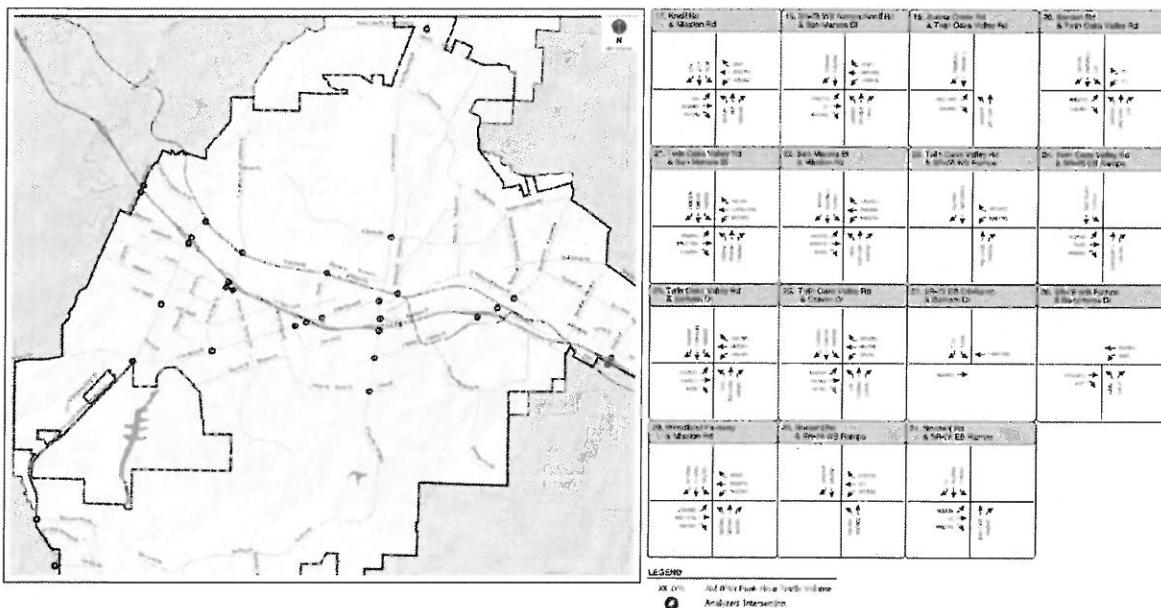
Sincerely,



JACOB M. ARMSTRONG, Chief  
Development Review Branch

*"Caltrans improves mobility across California"*

E17-7 The diagram is presented below for your reference:



Kiss, Lisa

RECEIVED

JAN 12 2012

25.

SAN MARCOS  
PLANNING DIVISION

**From:** Koller, Garth  
**Sent:** Thursday, January 12, 2012 7:31 AM  
**To:** Kiss, Lisa; Kuey, Peter  
**Cc:** Backoff, Jerry; Brindley, Karen  
**Subject:** FW: City of San Marcos "General Plan Update" Draft program Environmental Impact Report.  
**Attachments:** SD\_78\_City\_San Marcos\_GP\_EIR\_01092012.pdf

Here it is, Peter please review, Lisa please forward to AEOM

**From:** Jose Marquez [mailto:[jose\\_marquez@dot.ca.gov](mailto:jose_marquez@dot.ca.gov)]  
**Sent:** Wednesday, January 11, 2012 4:25 PM  
**To:** Koller, Garth  
**Subject:** Fw: City of San Marcos "General Plan Update" Draft program Environmental Impact Report.

Sorry Mr. Koller for the confusion, I meant to say City of San Marcos "General Plan Update" Draft program Environmental Impact Report in the subject line of my previous email

Dear Mr. Koller:

Please find below Caltrans' comment letter on the City of San Marcos "General Plan Update" Draft program Environmental Impact Report.

You will receive briefly an original letter by mail. Please let me know if you have any questions or comments.

Regards,

Jose I. Marquez-Chavez  
Associate Transportation Planner  
Regional & System Planning  
Caltrans District 11  
Planning Division, MS-240  
4050 Taylor Street  
San Diego, CA 92110  
TEL (619) 688-3193  
FAX (619) 688-2511



E18

JAN 12 2012  
#26.CITY OF SAN MARCOS  
PLANNING DIVISION

File Number 3330300

401 B Street, Suite 800  
San Diego, CA 92101-4231  
(619) 699-1900  
Fax (619) 699-1905  
[www.sandag.org](http://www.sandag.org)

January 5, 2012

Mr. Garth Koller, Principal Planner  
Development Services Department  
City of San Marcos  
1 Civic Center Drive  
San Marcos, CA 92069

## MEMBER AGENCIES

Cities of  
Carlsbad  
Chula Vista  
Coronado  
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Escondido  
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Oceanside  
Poway  
San Diego  
San Marcos  
Santee  
Solana Beach  
Vista  
and  
County of San Diego

## ADVISORY MEMBERS

Imperial County  
California Department of Transportation  
Metropolitan Transit System  
North County Transit District  
United States Department of Defense  
San Diego Unified Port District  
San Diego County Water Authority  
Southern California Tribal Chairman's Association  
Mexico

Dear Mr. Koller:

**SUBJECT:** Comments on the Draft Program Environmental Impact Report for the City of San Marcos General Plan Update

Thank you for the opportunity to comment on the Draft Program Environmental Impact Report (DPEIR) for the City of San Marcos General Plan Update. Our comments, which are based on policies included in the Regional Comprehensive Plan (RCP) and the 2050 Regional Transportation Plan (2050 RTP), are submitted from a regional perspective, emphasizing the need for land use and transportation coordination and implementation of smart growth principles.

E18-1

The San Diego Association of Governments (SANDAG) staff is recommending the following comments be addressed and analyzed in the DPEIR. These are outlined below:

## Specific Comments

1. Correction on page 3.16-28, Senate Bill 375 (Steinberg, 2008) (SB 375) section: Please remove reference to Cal Poly Pomona and the Southern California Association of Governments. E18-2
2. Correction on page 3.16-28, SANDAG Regional Transportation Plan section: first bullet should read "Extension of LRT to south Escondido." E18-3
3. Comment on page 3.16-29: Congestion Management Program section: The San Diego region opted out of the state Congestion Management Program (CMP) in October 2009 (Enclosure 1). Therefore, all references to CMP facilities (State Route 78, San Marcos Blvd, and Rancho Santa Fe Rd) and state CMP requirements should be removed from this chapter (sections 3.16.2, 3.16.4, and 3.16.5). E18-4

Although the region opted out of the state CMP, the federal CMP is still required. The requirements of the federal CMP are documented in Technical Appendix 20 of the 2050 RTP (Enclosure 2) and should be referenced/included in the DPEIR.

## **E18 SANDAG**

E18-1 This comment provides opening remarks and no further response is required.

E18-2 Comment noted. These references are removed from the text as follows:

SB 375 has four key components. First, SB 375 requires regional GHG emissions targets. CARB's Regional Targets Advisory Committee will guide the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the state. For San Marcos, the MPO is the SANDAG (see below). These targets, which MPOs may propose themselves, will be updated every 8 years in conjunction with the revision schedule for housing and transportation elements.

Second, MPOs will be required to create a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans (also prepared by SANDAG as the MPO for San Diego) be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

E18-3 This correction has been made in Section 3.16.2 under the heading *SANDAG Regional Transportation Plan and Sustainable Communities Strategy*.

E18-4 When the EIR was prepared, neither the preparer nor the City were aware that the region opted out of the CMP. As such, these references are no longer valid and will be removed from the EIR. Please note that this will not change any of the findings within the EIR.

## General Comments

### Smart Growth Opportunity Areas

A key goal of the RCP is to focus growth in smart growth opportunity areas. There are a total of eight Smart Growth Planning Area place types located within the City of San Marcos, and as you know, SANDAG is in the process of updating the Smart Growth Concept Map. SANDAG staff is working with all local jurisdictions to incorporate updated local land use inputs to reflect ongoing general and specific plan changes. We appreciate the help we are receiving from your staff on these updates.

E18-5

### Multimodal Transportation Analysis

The 2050 RTP sets forth a multimodal approach to meeting the region's transportation needs. As such, we recommend that the traffic analysis for the DPEIR strive to balance the needs of motorists, transit riders, pedestrians, and bicyclists. The Regional Multimodal Transportation Analysis, adopted by the SANDAG Board on October 14, 2011, is another tool that may be used to enhance traffic impact analysis of development projects where use by transit, bicycle, and/or pedestrians is anticipated. This new tool is available online at [www.sandag.org/igr](http://www.sandag.org/igr).

E18-6

We request that you coordinate the DPEIR's development with the 2050 RTP and its Sustainable Communities Strategy as well as the recently approved Regional Housing Needs Assessment.

### Transit and Highways

Please evaluate the consistency of the DPEIR and the City of San Marcos General Plan Update with the 2050 RTP goals as they relate to specific transit projects.

E18-7

### Transportation Demand Management

Please consider developing a site-specific Transportation Demand Management (TDM) plan that outlines your strategy/s for providing and promoting transportation alternatives to driving alone during peak periods, such as carpooling, vanpooling, bicycling, telecommuting, and flexible work hours for employees, to help mitigate regional transportation impacts. Carpooling and vanpooling could be promoted by providing priority reserved and/or free parking for high-occupancy vehicles. We recommend contacting the SANDAG iCommute team to explore TDM options.

E18-8

### Consult with North County Transit District (NCTD) and Caltrans

SANDAG advises the project applicant to consult with NCTD, the transit service providers within the project area, and with Caltrans to coordinate planned transit and/or highway improvements.

E18-9

### Natural Environment

A key RCP objective is to preserve and maintain natural areas in urban neighborhoods, such as canyons and creeks, and provide access for the enjoyment of the region's residents. Please consider this criteria if applicable to your project.

E18-10

- E18-5 The City appreciates the opportunity to continue to work with SANDAG in the updates to the Smart Growth Concept Map.
- E18-6 The city appreciates mention of the new traffic impact analysis tool geared toward development projects where transit, bicycle, and/or pedestrian use are anticipated. The methodology was adopted after the NOP was released for this assessment and after the technical assessment was completed for this EIR. However, the Mobility Element supports multimodal LOS and has implemented performance standards for achieving service levels based on Street Typologies. The City will investigate use of the SANDAG tool as part of future development within the City. The City will continue to coordinate with SANDAG and ensure that its plans are consistent with regional planning efforts.
- E18-7 The general plan incorporates the 2050 RTP improvements and is consistent with the goals related to transit projects. Page 13-9 identifies RTP improvements and states that the Mobility Element is consistent with the improvements.
- E18-8 Policies M3-1 through M3-9 all relate to TDM and decreasing the dependence on the single-occupant vehicle.
- E18-9 Policies M1-5 and M3-7 both require the City to coordinate with SANDAG, Caltrans, and NCTD on appropriate regional projects.
- E18-10 The General Plans includes policies within the Conservation and Open Space Element to preserve and maintain open space areas, including creeks and canyons. Please refer to Policies COS-2.1 and COS-2.2 and Implementation Program COS 2-1.

**Other Considerations**

Please consider the following State of California laws and Executive Order when developing the DPEIR: Assembly Bill 32 (Nunez, 2006), SB 375 (Steinberg, 2008), SB 97 (Dutton, 2007), and Executive Order S-13-08, which call for analysis of greenhouse gas emissions. Additionally, it is suggested that consideration be given to the policies included in the SANDAG Regional Energy Strategy that promote the reduction of energy demand and water consumption.

E18-11

We appreciate the opportunity to comment on the DPEIR for the City of San Marcos General Plan Update. We encourage the City of San Marcos, where appropriate, to evaluate the General Plan Update based on the following SANDAG publications: (1) Designing for Smart Growth, Creating Great Places in the San Diego Region; (2) Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region; (3) Trip Generation for Smart Growth; and (4) Parking Strategies for Smart Growth. These publications can be found on our Web site at [www.sandag.org/igr](http://www.sandag.org/igr).

E18-12

If you have any questions or concerns regarding E18-10, please contact me at (619) 699-1943 or [sba@sandag.org](mailto:sba@sandag.org).

Sincerely,



SUSAN BALDWIN  
Senior Regional Planner

SBA/RSA/hob

Enclosures: 1. CMP SANDAG Board of Directors October 23, 2009, Agenda Item 6  
2. Technical Appendix 20 of the 2050 RTP

E18-11 The Draft EIR does consider the identified California laws, Executive Order, and SANDAG's Regional Energy Strategy. Please refer to Sections 3.7 and 3.14 of the Draft EIR.

E18-12 The City appreciates the provided comments and has included concepts from the identified documents as appropriate throughout the General Plan.

DRAFT



BOARD OF DIRECTORS  
OCTOBER 23, 2009

AGENDA ITEM NO. 09-10-6  
ACTION REQUESTED - INFORMATION

26.

### CONGESTION MANAGEMENT PROGRAM PROCESS

File Number 3100400

#### Introduction

SANDAG, as the Congestion Management Agency (CMA), is required by state law to prepare and regularly update a Congestion Management Program (CMP) for the San Diego region. The last CMP update was adopted by SANDAG in November 2008. On May 8, 2009, the Board of Directors directed staff to work with local jurisdictions that wished to prepare resolutions electing to opt out of the state CMP. A majority of the jurisdictions representing a majority of the population have adopted resolutions electing to be exempt from the state CMP. This informational report also was presented at the October 16, 2009, Transportation Committee meeting.

#### Discussion

The purposes of the CMP are to monitor the performance of the transportation system, develop programs to address near-term and long-term congestion, and better integrate transportation and land use planning. SANDAG staff evaluated options for future direction of the CMP and discussed these options at multiple meetings of the Cities/County Transportation Advisory Committee and the Regional Planning Technical Working Group. One option was to streamline the SANDAG CMP process and the other was to opt out of the state CMP process. As previously stated, at its May 8, 2009, meeting, the Board of Directors discussed these options and voted to direct staff to work with local jurisdictions that wished to prepare resolutions electing to opt out of the state CMP.

E18-13

Assembly Bill (AB) 2419, passed in 1996, allows congestion management agencies to "opt out" of the state CMP process. Section 65088.3 of the California Government Code states "*This chapter does not apply in a county in which a majority of local governments, collectively comprised of the city councils and the county board of supervisors, which in total also represent a majority of the population in the county, each adopt resolutions electing to be exempt from the congestion management program.*" Over the past few months 14 out of the 19 local jurisdictions, representing a majority of the population in San Diego County have adopted resolutions electing to be exempt from the state CMP process. The local jurisdictions that adopted resolutions include: Carlsbad, Chula Vista, El Cajon, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, City of San Diego, County of San Diego, San Marcos, and Santee.

SANDAG will continue to meet the federal congestion management provisions through existing SANDAG planning and performance monitoring activities, such as the Regional Transportation Plan (RTP) and other multimodal performance monitoring efforts. Federal congestion management provisions are more flexible and utilize the RTP as the primary tool to provide solutions for congestion. The RTP includes identification and evaluation of anticipated performance and expected benefits of appropriate congestion management strategies (demand management, operational improvements, transit improvements, systems management improvements, etc.).

Additionally, appropriate analysis of multimodal strategies and alternatives for corridors is required when an increase in single occupancy vehicle capacity is proposed.

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**Next Steps**

SANDAG staff will notify the California Transportation Commission and State Controller of the region's decision to elect to be exempt from the state CMP.

**GARY L. GALLEGOS**  
Executive Director

Key Staff Contact: Heather Werdick, (619) 699-6967, [hwe@sandag.org](mailto:hwe@sandag.org)

Funds are budgeted in Work Element #3100400

E18-13 The City has read and acknowledges the submitted attachment. Please refer to Response to Comment E18-4.

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## Technical Appendix 20

## SANDAG Federal Congestion Management Process

E18-14

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# 2050 Regional Transportation Plan

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Cont.

## Introduction

Federal Highway Administration 23 CFR 450.320 requires that each transportation management area (TMA) address congestion management through a process involving an analysis of multimodal metropolitan wide strategies that are cooperatively developed to foster safety and integrated management of new and existing transportation facilities eligible for federal funding. The requirements specifically state that "in TMAs designated as nonattainment for ozone or carbon monoxide, the congestion management process shall provide an appropriate analysis of reasonable (including multimodal) travel demand reduction and operational management strategies for the corridor in which a project that will result in a significant increase in capacity for single occupancy vehicles (SOV) is proposed to be advanced with Federal funds." Additionally the guidelines state that "federal funds may not be programmed for any project that will result in a significant increase in the carrying capacity for SOVs (i.e., a new general purpose highway on a new location or adding general purpose lanes, with the exception of safety improvements or the elimination of bottlenecks), unless the project is addressed through a congestion management process meeting the requirements of this section."

SANDAG was designated as the TMA for the San Diego region. The 2050 RTP meets the requirements of 23 CFR 450.320 by incorporating the following federal congestion management process; performance monitoring and measurement of the regional transportation system, multimodal alternatives and non-SOV analysis, land use impact analysis, the provision of congestion management tools, and integration with the regional transportation improvement program (RTIP) process.

## Background

California State Proposition 111, passed by voters in 1990, established a requirement that urbanized areas prepare and regularly update a Congestion Management Program (CMP). The requirements within the State CMP were developed to monitor the performance of the transportation system, develop programs to address near-term and long-term congestion, and better integrate transportation and land use planning. SANDAG provided regular updates for the State CMP from 1991 through 2008. In October 2009, the San Diego region elected to be exempt from the State CMP and, since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region's continued compliance with the Federal congestion management process.

## Regional Transportation System

The 2050 Regional Transportation Plan (2050 RTP) includes a regional transportation system of highways, regional transit service, and regional arterials. Chapter 6 of the 2050 RTP provides a comprehensive overview of the components of systems development for the regional transportation network including the regional transit strategy, flexible roadway system, goods movement strategy, aviation and ground access, active transportation, and planning across borders components.

## Performance Monitoring

The 2050 RTP includes a variety of strategies to enhance regional transportation systems management including multimodal traffic management techniques, as well as new techniques related to both improving performance monitoring, and information and services to regional transportation systems users. Chapter 7 of the 2050 RTP provides a comprehensive overview of systems management techniques including

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- performance monitoring. Performance monitoring reports include the State of Commute Report, Regional Comprehensive Plan (RCP) Monitoring Report, the *TransNet* Independent Taxpayer Oversight Committee (ITOC) Quarterly Corridor Performance Report, as well as the Coordinated Public Transit – Human Services Transportation Plan (Coordinated Plan) Quarterly Transit Performance Monitoring Report.
- The State of the Commute, RCP Monitoring, and ITOC Quarterly Corridor Performance reports include and are not limited to monitoring:
- Freeway miles traveled per person during weekdays
  - Percent of roadways traveled (freeways versus local roads) versus total lane miles (freeways versus local roads)
  - Regional travel by transit
  - Total transit, rail, and bus ridership
  - San Diego regional annual transit boardings
  - Transit use in well served areas
  - Regional commute mode shares
  - Drive alone mode share
  - Alternative Transportation Mode share (carpool/vanpool, public transit, walk, bike, telework, other)
  - Auto and transit passenger travel times and travel volumes in key corridors
  - Annual hours of traffic delay per traveler
  - Annual peak period delay during weekends
- Regional bottlenecks determined by annual freeway delay (vehicle hours) per lane mile
- Delay by freeway during commute periods
- Annual freeway delay by major corridor per traveler (estimated)
- The State of the Commute Report is updated annually, while the RCP Monitoring Report is updated biennially.
- The Quarterly Transit Performance Monitoring Report includes monitoring the efficiency and productivity of transit operating services by service type. These indicators include:
- Operating cost per passenger
  - Operating cost per revenue hour
  - Passengers per revenue hour
  - Passengers per revenue mile
  - Revenue hours per employee
  - Farebox recovery rate
- The Coordinated Plan also includes annual transit performance indicators by service route for both the Metropolitan Transit System (MTS) and North County Transit District (NCTD). This plan is updated annually.
- Multimodal Alternatives and Non-Single Occupancy Vehicle Analysis**
- SANDAG incorporates multimodal alternative and non-SOV analysis throughout all levels of planning and/or programming for transportation project improvements. These forms of analysis are incorporated whether the project improvement relates to an SOV or non-SOV capacity increasing improvement. The three primary areas of project development involved in this analysis include

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regionwide study analysis through the RTP and RTIP, corridor study analysis, and local level analysis.

#### Regionwide Study Analysis

The RTP serves as the long-range transportation plan for the San Diego region. Updated every four years, the RTP incorporates recommendations from various corridor studies, transit studies, and project study reports. All projects, services, and programs are evaluated and prioritized for future funding. The RTP also includes regionwide and corridor level performance indicators that are reflective of a multimodal approach and inform the development and management of the most effective long-term transportation system, as well as demand management strategies for minimizing and/or managing anticipated congestion. Technical Appendices 3 and 4 provide a comprehensive overview of the development of the 2050 RTP transportation project evaluation criteria and plan performance measures and methodologies.

The RTIP serves as the short-term programming document that implements the RTP, and includes projects funded with federal, state, and local transportation funding. These projects include regionally significant capacity increasing projects (as identified in the RTP), minor projects, maintenance and operations projects and other exempt projects. For the regionally significant capacity increasing projects including SOV capacity increasing projects, the RTIP relies on the process implemented through the RTP for the coordination and consultation involved in developing and establishing the congestion management strategies. The projects included in the RTIP are the end result of implementing the process established in the RTP.

#### Corridor Study Analysis

Corridor studies incorporate RTP long-range multimodal transportation projects including operational improvements, highway capacity increasing improvements, transit service improvements, active transportation, and transportation demand management (TDM) and transportation systems management (TSM), etc. Corridor studies allow for opportunities to highlight the need for additional transportation improvements and/or the future planning development of projects as related to the RTP. Examples of recent SANDAG corridor studies include:

- I-15 Managed Lanes Study
- I-5 South Multimodal Corridor Study
- SR 78 Corridor Study

Other corridor studies include transportation concept summaries (TCS) and project study reports (PSR) developed by Caltrans and corridor system management plans (CSMP) jointly developed by Caltrans and SANDAG. The development of PSRs informs the development of RTP priorities and RTIP programming. As highway projects are further developed through the environmental phase, viable multimodal alternatives are analyzed along with capacity enhancing alternatives.

#### Local Level Analysis

Local jurisdiction projects that receive federal funds to develop capacity increasing improvements are required to provide sufficient documentation that an appropriate multimodal alternative and non-SOV analysis has been performed. This analysis is required to be completed prior to submitting a project for inclusion within the RTIP.

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## Land Use Impact Analysis

### Regional Models

The 2050 RTP includes the 2050 Regional Growth Forecast which is based on land use inputs gathered from the region's 18 incorporated cities and the County. These inputs include current adopted general and community plans, the County's Referral Map draft land use plan of 2009 with adjustments to reflect habitat constraints, and draft general plan updates, as provided by the local land use authority. In many cases jurisdictions are moving forward with Smart Growth principles as outlined in the Regional Comprehensive Plan (RCP). SANDAG uses four models in its forecasts: (1) the Demographic and Economic Forecasting Model (DEFM), (2) the Interregional Commute Model (IRCM), (3) the Urban Development Model (UDM) and (4) the Transportation Forecasting Model. The 2050 RTP Technical Appendix 15 provides additional information specifically related to the SANDAG transportation modeling process.

### Intergovernmental Review

Per state law, SANDAG has the authority to determine whether a project or plan will need to be reviewed for regional significance. SANDAG staff reviews projects and determines if they are regionally significant based on the amount of traffic generated and other regionally significant issues. If significant, environmental review of projects should include consideration of applicable policy objectives contained in the RCP and 2050 RTP.

For projects considered to have significant impacts, SANDAG staff provides comments from a regional perspective that emphasize the need for land use and transportation coordination and are based on policies contained in the RCP and the 2050 RTP. In addition to the RCP and 2050 RTP, SANDAG

provides resources for the evaluation of projects including:

- San Diego Region Aggregate Supply Study
- Designing for Smart Growth, Creating Great Places in the San Diego Region
- Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region
- Trip Generation for Smart Growth
- Parking Strategies for Smart Growth
- Regional Multimodal Analysis Study

### Congestion Management Tools

The 2050 RTP provides a variety of congestion management tools. Many of these tools and strategies are included within Chapters 6, 7, and 8 of the 2050 RTP. In addition to the 2050 RTP, the RCP provides incentives and assistance to local member agencies to encourage smart growth development in the areas identified on the Smart Growth Concept Map. The SANDAG "Smart Growth Tool Box" includes both planning and financial tools.

### Systems Development Measures

- Improvements to the current system that will improve the convenience and travel speed of bus and rail services
- Implementation of new transit services that will improve transit in more areas and offer new service types designed to attract new riders to transit
- Enhancing the transit customer experience to make transit easier, safer, and more enjoyable to use
- Continue to develop and enhance active transportation through bicycle and

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- pedestrian facilities and bike lockers, and implementation of Regional Bicycle Plan
  - Continue to develop and enhance safe routes to schools plans and strategies
- TSM Measures**
- Multimodal integration and performance based management including performance monitoring and real time modeling/simulation
  - Traveler information
  - Arterial management
  - Freeway management
  - Transit management – bus and light rail including regional scheduling system (RSS), regional transit management system (RTMS), positive train control (PTC), and centralized train control (CTC)
  - Electronic payment services including Compass Card, FasTrak® Open Road Tolling, and smart parking systems
  - Advanced technologies including wireless detection, real time multimodal modeling and simulation, etc.
- TDM Measures**
- iCommute – the regional TDM program
  - TDM strategy – outreach, education, and financial incentives
  - TDM programs including regional vanpool, carpool, buspool, school services (SchoolPool), telework and alternative work schedules, and bicycle encouragement programs, and multimodal solutions including first- and last-mile solutions, Compass Card integration, and 511 advanced traveler information services
- New directions including corridor approach and construction mitigation
  - Performance monitoring
- RCP Implementation Measures**
- Outreach program
  - Smart Growth Concept Map
  - Visualization tools and photo library
  - Smart growth design guidelines
  - Smart growth trip generation/parking study
  - Research on connections between public health, land use, and transportation
  - Planning and designing for pedestrians
  - TransNet Smart Growth Incentive Program (SGIP)*
  - TDA/TransNet Bicycle, Pedestrian, and Neighborhood Safety Program
- Regional/Federal Transportation Improvement Program**
- The Regional/Federal Transportation Improvement Program (RFITIP) is a multi-billion dollar, five-year program of major highway, transit, arterial, and nonmotorized projects funded by federal, state, *TransNet* local sales tax, and other local and private funding.
- The RTIP serves as a prioritized program designed to implement the region's overall strategy for providing mobility and improving the efficiency and safety of the transportation system, while reducing transportation related air pollution in support of efforts to attain federal and state air quality standards for the region.

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Chapters 2 and 3 in the 2010 RTIP provide a description of the development process, including federal, state, and *TransNet* transportation programming requirements and the detailed listings of projects. All local agency SOV capacity increasing projects seeking or that is eligible for federal funds are required to perform a multimodal alternative and non-SOV analysis prior to submitting SOV capacity increasing projects for inclusion in the RTIP. The multimodal alternative and non-SOV analysis must document an SOV capacity increasing project assessment that has considered the components within the congestion management tools section of the SANDAG Federal Congestion Management Process:

- Systems development measures
- TSM measures
- TDM measures
- RCP implementation measures

Each agency is required to assess whether the project has been evaluated for non-SOV capacity improvements. Agency documentation should be provided to SANDAG when submitting the project for inclusion in the RTIP.

E18-14 The City has read and acknowledges the submitted attachment. Please refer to Response to Comment E18-4.

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